

Summons - Alias Summons

(12/31/15) CCG No. 01

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GLENN KUSHNER

v.

ROAD RUNNER LOGISTICS, INC;
SANTIAGO MENDOZA-SANDINO

No. 2017-L-010619

Defendant Address:

ROAD RUNNER LOGISTICS, INC
1290 S. HIGHWAY 135
NAYLOR, GA 31641☒ SUMMONS ☐ ALIAS - SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602 | | |
| <input type="checkbox"/> District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077 | <input type="checkbox"/> District 3 - Rolling Meadows
2121 Euclid 1500
Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood
Maybrook Ave.
Maywood, IL 60153 |
| <input type="checkbox"/> District 5 - Bridgeview
10220 S. 76th Ave.
Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham
16501 S. Kedzie Pkwy.
Markham, IL 60428 | <input type="checkbox"/> Richard J. Daley Center
50 W. Washington, LL-01
Chicago, IL 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

☒ Atty. No.: 57194

Name: BLUMENTHAL LAW GROUP PC

Atty. for: GLENN KUSHNER

Address: 180 N LASALLE #3700

City/State/Zip Code: CHICAGO, IL 60601

Telephone: (312) 981-5055

Primary Email Address: gblumenthal@blumenthal-law.com

Secondary Email Address(es):

xena@blumenthal-law.com

Witness:

Thursday, 19 October 2017

/s/ DOROTHY BROWN

DOROTHY BROWN, Clerk of Court



Date of Service:

(To be inserted by officer on copy left with Defendant or other person)

**Service by Facsimile Transmission will be accepted at:

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Page 1 of 1

Law DIVISION
Litigant List

Printed on 10/19/2017

Case Number: 2017-L-010619

Page 1 of 1

Plaintiffs

Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
GLENN KUSHNER				

Total Plaintiffs: 1

Defendants

Defendant Name	Defendant Address	State	Unit #	Service By
ROAD RUNNER LOGISTICS, INC	1290 S. HIGHWAY 135 NAYLOR,	GA	31641	Sheriff-Filer
SANTIAGO MENDOZA-SANDINO	1290 S. HIGHWAY 135 NAYLOR,	GA	31641	Sheriff-Filer

Total Defendants: 2



E-Notice

2017-L-010619
CALENDAR: F

To: Grant Blumenthal
gblumenthal@blumenthal-law.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GLENN KUSHNER vs. ROAD RUNNER LOGISTICS, INC
2017-L-010619

The transmission was received on 10/19/2017 at 1:23 PM and was ACCEPTED with
the Clerk of the Circuit Court of Cook County on 10/19/2017 at 2:00 PM.

CIVIL_ACTION_COVER_SHEET (LAW DIVISION)
COMPLAINT

Filer's Email: gblumenthal@blumenthal-law.com
Filer's Fax: (312) 416-7963
Notice Date: 10/19/2017 2:00:24 PM
Total Pages: 6

DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
COOK COUNTY
RICHARD J. DALEY CENTER, ROOM 1001
CHICAGO, IL 60602

(312) 603-5031
courtclerk@cookcountycourt.com

Civil Action Cover Sheet - Case Initiation

(05/27/18) CCL 0628

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

GLENN KUSHNER

v.

ROAD RUNNER LOGISTICS, INC

No. _____

CIVIL ACTION COVER SHEET - CASE INITIATION

A Civil Action Cover Sheet - Case Initiation shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box in front of the appropriate case type which best characterizes your action. Only one (1) case type may be checked with this cover sheet.

Jury Demand ☒ Yes ☐ No

PERSONAL INJURY/WRONGFUL DEATH

CASE TYPES:

- ☒ 027 Motor Vehicle
☐ 040 Medical Malpractice
☐ 047 Asbestos
☐ 048 Dram Shop
☐ 049 Product Liability
☐ 051 Construction Injuries
 (including Structural Work Act, Road
 Construction Injuries Act and Negligence)
☐ 052 Railroad/FELA
☐ 053 Pediatric Lead Exposure
☐ 061 Other Personal Injury/Wrongful Death
☐ 063 Intentional Tort
☐ 064 Miscellaneous Statutory Action
 (Please Specify Below**)
☐ 065 Premises Liability
☐ 078 Fen-phen/Redux Litigation
☐ 199 Silicone Implant

TAX & MISCELLANEOUS REMEDIES

CASE TYPES:

- ☐ 007 Confession Of Judgment
☐ 008 Replevin
☐ 009 Tax
☐ 015 Condemnation
☐ 017 Detinue
☐ 029 Unemployment Compensation
☐ 031 Foreign Transcript
☐ 036 Administrative Review Action
☐ 085 Petition to Register Foreign Judgment
☐ 099 All Other Extraordinary Remedies

By: _____ /s GRANT BLUMENTHAL

(Attorney)

(ProSe)

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 10/19/2017 1:23 PM
 2017-L-010619
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 CIRCUIT COURT OF
 COOK COUNTY, ILLINOIS
 LAW DIVISION
 CLERK DOROTHY BROWN

(FILE STAMP)

COMMERCIAL LITIGATION

CASE TYPES:

- ☐ 002 Breach of Contract
☐ 070 Professional Malpractice
 (other than legal or medical)
☐ 071 Fraud (other than legal or medical)
☐ 072 Consumer Fraud
☐ 073 Breach of Warranty
☐ 074 Statutory Action
 (Please Specify Below**)
☐ 075 Other Commercial Litigation
 (Please Specify Below**)
☐ 076 Retaliatory Discharge

OTHER ACTIONS

CASE TYPES:

- ☐ 062 Property Damage
☐ 066 Legal Malpractice
☐ 077 Libel/Slander
☐ 079 Petition for Qualified Orders
☐ 084 Petition to Issue Subpoena
☐ 100 Petition for Discovery

**

Primary Email: gblumenthal@blumenthal-law.comSecondary Email: apena@blumenthal-law.com

Tertiary Email: _____

Pro Se Only: ☐ I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's Office for this case at this email address: _____

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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2017-L-010619
CALENDAR: F
PAGE 1 of 5
CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
LAW DIVISION
CLERK DOROTHY BROWN

GLENN KUSHNER,)	
)	
Plaintiff)	No. _____
)	
vs.)	Amount claimed: In excess of
)	\$50,000.00 plus costs.
ROAD RUNNER LOGISTICS, INC, a)	
Georgia Corporation, and SANTIAGO)	Plaintiff Demands Trial
MENDOZA-SANDINO.)	By Jury
)	
Defendants)	

COMPLAINT AT LAW

Plaintiff, GLENN KUSHNER, by his attorneys, BLUMENTHAL LAW GROUP, PC, complaining of Defendants ROAD RUNNER LOGISTICS, INC ("ROAD RUNNER"), and SANTIAGO MENDOZA-SANDINO states as follows:

1. On and prior to November 30, 2015, 15th Avenue was a roadway running north and south, and North Avenue was a roadway running east and west, and said streets intersected in the City of Melrose Park, Cook County, Illinois.
2. At said time and place, defendant, ROAD RUNNER, was a Georgia Corporation, with its principal place of business at 1290 S. Highway 135, Naylor, GA 31641, authorized to do business and doing business as a trucking company which owned, controlled and/or maintained a 2005 Dane TL commercial vehicle bearing Georgia license tag number TR80585 and vehicle identification number 1GRAA06275S701730.
3. At said time and place, defendant, ROAD RUNNER, owned, leased, operated, maintained, managed and/or controlled the foregoing commercial vehicle which was proceeding southbound in the center lane on 15th Avenue and was in the process of making a right turn onto westbound North Avenue.

4. At said time and place, defendant SANTIAGO MENDOZA-SANDINO was the agent, servant and/or employee of defendant, ROAD RUNNER, and was operating the foregoing commercial vehicle in the course and scope of his duties as agent, servant and/or employee and in furtherance of the interests of defendant ROAD RUNNER.

5. At said time and place, plaintiff, GLENN KUSHNER, was stopped in the far-right southbound lane of 15th Avenue at its intersection with North Avenue.

6. At said time and place, the commercial vehicle driven by SANTIAGO MENDOZA-SANDINO made a right-hand turn from the center southbound lane and struck the vehicle driven by plaintiff, GLENN KUSHNER.

COUNT I – NEGLIGENCE
(DEFENDANT SANTIAGO MENDOZA-SANDINO)

7. Plaintiff incorporates paragraphs No. 1 through No. 6 of this Complaint as if the allegations were set forth fully herein.

8. At said time and place, Defendant SANTIAGO MENDOZA-SANDINO had a duty to exercise reasonable care and caution to avoid injury to other drivers on the roadway including plaintiff, GLENN KUSHNER.

9. At said time and place, Defendant SANTIAGO MENDOZA-SANDINO was negligent in one or more of the following ways:

- a. Failed to exercise reasonable care and caution when executing a right turn;
- b. Failed to maintain a proper lookout;
- c. Failed to yield right of way;
- d. Failed to obey traffic control devices;
- e. Failed to properly utilize turn signals;
- f. Failed to maintain a proper speed for conditions;

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- g. Failed to reduce speed to avoid an accident;
- h. Failed to maintain a proper distance between vehicles;
- i. Failed to maintain his vehicle within his lane;
- j. Turned right from the center lane when it was not practical to do so in violation of 625 ILCS 11-801(a)(1);
- k. Started and/or moved his vehicle before such movement could be made with reasonable safety in violation of 625 ILCS 5/11-803;
- l. Turned right from the center lane when his vehicle was not in a proper position to make the turn and when turning could not be made with reasonable safety in violation of 625 ILCS 11-804(a);
- m. Failed to give an appropriate signal before turning in violation of 625 ILCS 5/11-804(a);
- n. Otherwise failed to exercise reasonable care and caution to avoid injuring plaintiff GLENN KUSHNER.

10. As a proximate result of one or more of the foregoing negligent acts or omissions of defendant, SANTIAGO MENDOZA-SANDINO, plaintiff GLENN KUSHNER sustained physical, mental and/or emotional injuries, past and future pain and suffering, past and future medical expenses, disability, permanency and/or loss of wages, earnings and income.

WHEREFORE, Plaintiff Glenn Kushner demands compensatory damages against Defendant SANTIAGO MENDOZA-SANDINO in an amount in excess of fifty thousand dollars (\$50,000.00) plus costs and such other relief as the Court deems appropriate.

COUNT II – RESPONDEAT SUPERIOR
(DEFENDANT ROAD RUNNER)

11. Plaintiff incorporates paragraphs No. 1 through No. 10 of this Complaint as if the allegations were set forth fully herein.

12. At said time and place, Defendant SANTIAGO MENDOZA-SANDINO was an employee of defendant, ROAD RUNNER, and was operating the foregoing commercial vehicle

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PAGE 3 of 5

in the course and scope of his duties as an employee and in furtherance of the interests of defendant ROAD RUNNER.

WHEREFORE, Plaintiff Glenn Kushner demands compensatory damages against Defendant ROAD RUNNER LOGISTICS, INC. in an amount in excess of fifty thousand dollars (\$50,000.00) plus costs and such other relief as the Court deems appropriate.

COUNT III - AGENCY
(DEFENDANT ROAD RUNNER)

13. Plaintiff incorporates paragraphs No. 1 through No. 10 of this Complaint as if the allegations were set forth fully herein.

14. At said time and place, Defendant SANTIAGO MENDOZA-SANDINO was an agent of ROAD RUNNER, and was operating the foregoing commercial vehicle within the scope of his authority on behalf of defendant ROAD RUNNER and in furtherance of the interests of defendant ROAD RUNNER.

WHEREFORE, Plaintiff Glenn Kushner demands compensatory damages against Defendant ROAD RUNNER LOGISTICS, INC. in an amount in excess of fifty thousand dollars (\$50,000.00) plus costs and such other relief as the Court deems appropriate.

Respectfully submitted,

/s/ Grant Blumenthal
Grant Blumenthal
Blumenthal Law Group PC
Attorneys for Plaintiff
180 N. LaSalle Street Suite 3700
Chicago Illinois 60601
(312) 981-5055
gblumenthal@blumenthal-law.com
Cook ID: 57194

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PAGE 4 of 5

IN THE CIRCUIT COURT OF COOK COUNTY ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

GLENN KUSHNER,

Plaintiff

vs.

ROAD RUNNER LOGISTICS, INC, a
Georgia Corporation, and SANTIAGO
MENDOZA-SANDINO.

Defendants

No. _____

Amount claimed: In excess of
\$50,000.00 plus costs.

Plaintiff Demands Trial
By Jury

AFFIDAVIT

The undersigned certifies pursuant to Illinois Supreme Court Rule 222(b) and 735 ILCS 5/1-109 of the Illinois Code of Civil Procedure that the total damages sought in this action does exceed fifty thousand dollars (\$50,000.00).

/s/ Grant Blumenthal
BLUMENTHAL LAW GROUP PC
By Grant Blumenthal

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2017-L-010619
PAGE 5 of 5

Grant Blumenthal
Blumenthal Law Group PC
Attorneys for Plaintiff
180 N. LaSalle Street Suite 3700
Chicago Illinois 60601
(312) 981-5055
gblumenthal@blumenthal-law.com
Cook ID: 57194

Summons - Alias Summons

(12/31/15) CCG No.01

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GLENN KUSHNER

v.

ROAD RUNNER LOGISTICS, INC;
SANTIAGO MENDOZA-SANDINO

No. 2017-L-010619

Defendant Address:

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1290 S. HIGHWAY 135
NAYLOR, GA 31641☒ SUMMONS ☐ ALIAS - SUMMONS

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- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602 | | |
| <input type="checkbox"/> District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077 | <input type="checkbox"/> District 3 - Rolling Meadows
2121 Euclid 1500
Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood
Maybrook Ave.
Maywood, IL 60153 |
| <input type="checkbox"/> District 5 - Bridgeview
10220 S. 76th Ave.
Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham
16501 S. Kedzie Pkwy.
Markham, IL 60428 | <input type="checkbox"/> Richard J. Daley Center
50 W. Washington, LL-01
Chicago, IL 60602 |

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☒ Atty. No.: 57194

Name: BLUMENTHAL LAW GROUP PC

Atty. for: GLENN KUSHNER

Address: 180 N LASALLE #3700

City/State/Zip Code: CHICAGO, IL 60601

Telephone: (312) 981-5055

Primary Email Address: gblumenthal@blumenthal-law.com

Secondary Email Address(es):

sena@blumenthal-law.com

Witness:

Thursday, 19 October 2017

/s/ DOROTHY BROWN

DOROTHY BROWN, Clerk of Court



Date of Service:

(To be inserted by officer on copy left with Defendant or other person)

**Service by Facsimile Transmission will be accepted at:

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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